



February 3, 2006

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060 and EB Docket No. 06-36  
CPNI Compliance Certification  
Laurel Highland Telephone Company**

Dear Ms. Dortch:

This filing is intended to respond to the Commission's directive to file on or before February 6, 2006, Laurel Highland Telephone Company's ("Company") Customer Proprietary Network Information ("CPNI") Compliance Certification.

It is our policy to protect the confidential CPNI of our customers, other telecommunications carriers, and equipment manufacturers and we believe, in good faith, that our efforts have advanced this underlying objective as evidenced by the following excerpts from the Company's Employment Policy Statement:

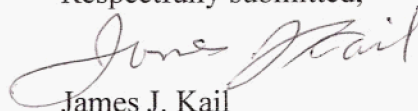
- Employees who have access to records and other personal information about customers and other employees, including customer billing information, payroll records, financial data, and trade secrets, must not discuss this information with anyone else without proper authority.
- It is especially important, due to the Pennsylvania Public Utility Commission's existing regulations, that the disclosure of customer information not be conveyed to anyone other than another employee, and then only on an absolute need to know basis.
- No employee should discuss proprietary information with other Company employees in any public place where it is possible they could be overheard. Employees who have regular access to proprietary information may be asked to sign an agreement not to disclose the information to any outside party.
- Employees who violate the Company's confidentiality policy will be subject to disciplinary action up to and including discharge.

When responding to the Commission's recent Public Notice, DA 06-223 (January 30, 2006), the Company initiated a close examination of our CPNI practices which included a review of our CPNI obligations with management members and our outside legal counsel. As a result of this review, we have identified steps that will assist the Company's continuing compliance with CPNI as well as areas that will require additional steps in order for the Company to be able to execute the certification required by 47 CFR 64.2009(e). Accordingly, erring on the side of caution, the Company submits the attached Certification. In this Certification, the Company, in good faith, attests that it is undertaking current actions to ensure compliance. The Company also commits to submit a supplementary updated filing at a future date when its internal review is completed. Attached to this filing are a Company Policy and Operating Guidelines that the Company intends to formally adopt and incorporate into its Employment Policy Statement upon completion of this process.

We note at this point that the Company takes seriously its obligation to protect the confidential nature of its CPNI, and we are unaware of our activities that are connected to recently publicized "brokering" activities that would implicate, contemplate, or otherwise compromise the confidentiality of our customers' CPNI.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

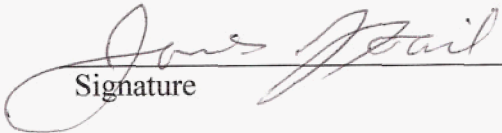
A handwritten signature in dark ink, appearing to read "James J. Kail", written in a cursive style.

James J. Kail  
President & CEO  
Laurel Highland Telephone Company



## CERTIFICATION

I, James J. Kail, President & CEO of Laurel Highland Telephone Company (the "Company") do hereby declare under penalties of perjury that I am an officer of the Company and that (1) the Company is undertaking current actions to ensure full compliance with applicable FCC Rules, and (2) intends to submit a supplementary updated filing at a future date when the internal review is completed. This information is true and accurate to the best of my knowledge, information, and belief.

  
Signature

February 3, 2006  
Date